

To Air Resources board,

12/11/2013

Since 2006, the EPA and numerous industry segments have been working to put cleaner diesel equipment on the road and retrofit or replace older equipment to minimize emissions.

According to the EPA, funding went to 350 grantees and was used to retrofit, replace, or repower more than 50,000 vehicles and equipment, resulting in emissions reductions of at least 203,900 tons of nitrogen oxide (NOx) and 12,500 tons of particulate matter (PM) over the life of the engines. In addition, the program has realized carbon monoxide (CO) emissions reductions of 48,000 tons, hydrocarbon (HC) emissions reductions of 18,000 tons, and carbon dioxide (CO2) emissions reductions of 2.3 million tons. Additional savings of diesel fuel from idling reduction is estimated at 205 million gallons.

This is a fantastic feat, however; it comes at a large price to those that want to do business legally. As the Regulatory Compliance officer for our company, I wanted to address the issue of financial responsibility that is incurred to all companies that do not have the luxury of a grant. We have met or exceeded the requirements of the Bus and Truck regulations. This has been an expensive process. Finding ways to help support these costs are extremely hard because we cannot pass the costs associated along to the downstream customer. These costs are essentially an investment that makes profitability a longer termed goal. Repowering existing vehicles that comply with the 2010 requirements at this time appears to be unnecessary.

We address the proposal to usher in new generations of lower emitting trucks at this time. If standards are changed or made too expensive to adhere to, than this is not doing the environment any good because businesses will not comply. Fines would be incurred but the air quality would diminish. The act of putting these safeguards in place is to ensure that air quality improves. Making it too hard or too expensive just ensures that our air quality goals will not be met.

Please accept this letter as intent to leave the emissions requirements as they are. We have all been given guidelines to comply until the year 2025 and if you want the industry to trust the decisions of the EPA and the Air Resources Board in the future with more conservative measures, than you

should stand by your initial consultation to maintain your fleets efficiency to emission levels until the year 2025.

The industry appreciates your diligence and hard work to keep our air clean and hope that you consider our business needs as well. Thank you for your time.

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